

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GREAT LAKES ACQUISITION
CORP.,

Plaintiff,

v.

NATASHA (OGINSKY) SANDERS,

Defendant.

Case No. 21-cv-10143

Hon. Robert H. Cleland

Magistrate Judge Elizabeth A. Stafford

Motion/Request for Clerk's Entry of Default

In accordance with Federal Rule of Civil Procedure 55(a), I request that a Clerk's Entry of Default be entered against Natasha (Oginsky) Sanders for failure to plead or otherwise defend.

Affidavit

In support of my request for Clerk's Entry of Default, I state that:

1. The summons and complaint were served on March 8, 2021 at 2451 Midtown Avenue, Apt. 1608, Alexandria VA 22303-1439 by certified mail with return receipt and restricted delivery, consistent with Federal Rule of Civil Procedure 4(e) and Michigan Court Rule 2.105(A).

2. The defendant has failed to plead or otherwise defend in accordance with Fed. R. Civ. P. 12

3. The defendant is not an infant, incompetent person or a member of the military service.

4. To the extent required by Local Rule 7.1, undersigned counsel made numerous attempts to inform the defendant that Plaintiff planned to ask for the entry of a default, including through emails on April 6, 2021 and April 9, 2021; telephone calls on April 9, 2021, April 12, 2021, and April 16, 2021; and a letter sent by Federal Express on April 9, 2021 which was delivered on April 12, 2021. (See Exhibits A, B, C, D.). Defendant did not respond to the emails or letters, did not answer the telephone calls, and did not respond to a voicemail.

5. This statement is true and is signed under the penalty of perjury.

Date: April 16, 2021

/s/ Thomas J. Davis

Thomas J. Davis

Bar No. P78626

Attorney for Plaintiff

280 N. Old Woodward Ave., Ste. 400

Birmingham, MI 48009

(248) 645-0000

tdavis@khvpf.com

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2021, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, and I hereby certify that I have served the document by USPS Priority Mail with tracking to the following non-ECF participant:

Natasha (Oginsky) Sanders
2451 Midtown Ave., Apt. 1608
Alexandria, VA 22303-1439

/s/Michelle R. Beveridge
Michelle R. Beveridge
Kienbaum Hardy Viviano
Pelton & Forrest, PLC
280 N. Old Woodward Ave., Ste. 400
Birmingham, MI 48009